JHPII
We Win. Things Change.

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

CLARENCE GLENN, DEMETRIUS PHILLIPS, NICOLE MILAN, and CHRIS HUDSON, **Plaintiffs,** **v** **TRIMAC TRANSPORTATION, INC, TRIMAC TRANSPORTATION SOUTH, INC, TRIMAC EQUIPMENT LEASING, INC, NATIONAL TANK SERVICES, A TRIMAC COMPANY, BAYER, U.S., LLC, THE DOW CHEMICAL COMPANY, E. I. DU PONT DE NEMOURS AND COMPANY, MONSANTO COMPANY, HUNTSMAN PETROCHEMICAL LLC, ZEP, INC, BASF CORPORATION, WHITAKER OIL COMPANY, USHER TRANSPORT, INC, DILLON LOGISTICS, INC, LANGER TRANSPORT CORPORATION, LISK TRUCKING, INC, MANFREDI MOTOR TRANSIT CORPORATION, JAMES WRIGHT, JOSEPH CARSON, KEN COOPER, JAMES PETWAY, PAT HORN, JOHNNY ROGERS, SHAWN STEPHENS, KIM BARTHLOW, STEPHANIE ROGERS, SHERMAINE THRASH and JOHN DOES 1-10,** **Defendants.**	**CIVIL ACTION FILE** **NO.**

COMPLAINT FOR DAMAGES

NOW COMES PLAINTIFF **CLARENCE GLENN (“GLENN”), DEMETRIUS PHILLIPS (“PHILLIPS”) NICOLE MILAN (“MILAN”) and CHRIS HUDSON (“HUDSON”)** (“Plaintiffs”) and make and file this their Complaint against Defendants **TRIMAC TRANSPORTATION, INC ("TRIMAC"), TRIMAC TRANSPORTATION SOUTH, INC (“TRIMAC SOUTH”), TRIMAC EQUIPMENT LEASING, INC (“TRIMAC LEASING”), NATIONAL TANK SERVICES (“NATIONAL”) A TRIMAC COMPANY (“TRIMAC DEFENDANTS”), BAYER U.S., LLC (“BAYER”), THE DOW CHEMICAL COMPANY (“DOW”), E. I. DU PONT DE NEMOURS AND COMPANY (“DUPONT”), MONSANTO COMPANY (“MONSANTO”), HUNTSMAN PETROCHEMICAL LLC, (HUNTSMAN”), ZEP, INC (“ZEP”) (“Chemical Company Defendants”), WHITAKER OIL COMPANY (“WHITAKER”), USHER TRANSPORT, INC. (“USHER”), DILLON LOGISTICS, INC. (“DILLON”), LANGER TRANSPORT CORPORATION (“LANGER”), LISK TRUCKING, INC. (“LISK”), MANFREDI MOTOR TRANSIT CORPORATION (“MANFREDI”), (“HAULER DEFENDANTS”), JAMES WRIGHT (“WRIGHT”), JOSEPH CARSON (“CARSON”), KEN COOPER (“COOPER”), JAMES PETWAY (“PETWAY”), PAT HORN (“HORN”), JOHNNY ROGERS (“ROGERS”), SHAWN STEPHENS (“STEPHENS”) KIM BARTHLOW (“BARTHLOW”), STEPHANIE**

ROGERS (“S ROGERS”), SHERMAINE THRASH (“THRASH”), (“Individual Defendants”), (collectively, “DEFENDANTS”) and JOHN DOES 1-10.

PARTIES, JURISDICTION AND VENUE

1. Plaintiff **CLARENCE GLENN (“GLENN”)** is a resident of Georgia.
2. Plaintiff **DEMETRIUS PHILLIPS (“PHILLIPS”)** is a resident of Georgia.
3. Plaintiff **NICOLE MILAN (“MILAN”)** is a resident of Georgia. **MILAN** is and was at all times pertinent to this Complaint **PHILLIPS’** wife.
4. Plaintiff **CHRIS HUDSON (“HUDSON”)** is a resident of Georgia.
5. Defendant **TRIMAC TRANSPORTATION, INC (“TRIMAC”)** is a Texas corporation with its principal place of business in Houston, Texas. **TRIMAC’S** US headquarters is at 15333 JOHN F KENNEDY BLVD HOUSTON, TX 77032-2353. **TRIMAC** is a Texas corporation doing business in Georgia with its principal places of business located at 6800 McLarin Rd, Fairburn, GA 30213 and 605 Selig Drive SW**,** Atlanta, Georgia 30336. **TRIMAC** may be served by delivering a copy of the summons and complaint to its registered agent, CORPORATION SERVICE COMPANY, at 40 Technology Pkwy South, #300, Norcross,

GA, 30092. **TRIMAC** is subject to the jurisdiction of this Court. Venue is proper in this Court.

6. At the time of the **TRIMAC** operations set forth in this complaint, **TRIMAC** was doing business in the State of Georgia and specifically in Atlanta and Fairburn, in Fulton County, Georgia.
7. Defendant **TRIMAC TRANSPORTATION SOUTH, INC ("TRIMAC SOUTH")** is a Texas corporation with its principal place of business at 15333 JOHN F KENNEDY BLVD HOUSTON, TX 77032-2353. Defendant **TRIMAC SOUTH** may be served by delivering a copy of the summons and complaint to its registered agent, CORPORATION SERVICE COMPANY, at 40 Technology Pkwy South, #300, Norcross, GA, 30092**. TRIMAC SOUTH** is subject to the jurisdiction of this Court. Venue is proper in this Court.
8. Defendant **TRIMAC EQUIPMENT LEASING, INC ("TRIMAC LEASING")** is a Texas corporation with its principal place of business at 15333 JOHN F KENNEDY BLVD HOUSTON, TX 77032-2353. **TRIMAC LEASING** may be served by delivering a copy of the summons and complaint to its registered agent, CORPORATION SERVICE COMPANY, at 40 Technology Pkwy South, #300, Norcross, GA, 30092.

TRIMAC LEASING is subject to the jurisdiction of this Court. Venue is proper in this Court.

9. Defendant **NATIONAL TANK SERVICES**, **("NATIONAL")** is a TRIMAC DBA and a TRIMAC COMPANY with its principal place of business at 15333 JOHN F KENNEDY BLVD HOUSTON, TX 77032-2353. **NATIONAL** may be served by delivering a copy of the summons and complaint to its registered agent, CORPORATION SERVICE COMPANY, at 40 Technology Pkwy South, #300, Norcross, GA, 30092. **NATIONAL** is subject to the jurisdiction of this Court. Venue is proper in this Court.

10. Defendant **BAYER U.S., LLC ("BAYER")** is a DELAWARE corporation with its principal place of business at 100 BAYER ROAD, Pittsburgh, PA, 15205-9741**. BAYER** may be served by service on its registered agent for service of process, CORPORATION SERVICE COMPANY at 40 TECHNOLOGY PARKWAY SOUTH, SUITE 300, NORCROSS, GA, 30092, USA. **BAYER** is subject to the jurisdiction of this Court. Venue is proper in this Court.

11. Defendant **THE DOW CHEMICAL COMPANY ("DOW")** is a DELAWARE corporation with its principal place of business at 2211 H.

H. DOW WAY, MIDLAND, MI, 48674. **DOW** may be served by service on its registered agent for service of process, THE CORPORATION COMPANY at 112 North Main Street, Cumming, Forsyth County Georgia, 30040, USA. **DOW** is subject to the jurisdiction of this Court. Venue is proper in this Court.

12. Defendant **E. I. DU PONT DE NEMOURS AND COMPANY ("DUPONT")** is a DELAWARE corporation with its principal place of business at 974 Centre Road, P.O. Box 2915, WILMINGTON, DE, 19805, USA. **DUPONT** may be served by service on its registered agent for service of process, CT Corporation System at 289 S Culver St, Lawrenceville, Gwinnett County, GA, 30046-4805, USA. **DUPONT** is subject to the jurisdiction of this Court. Venue is proper in this Court.

13. Defendant **MONSANTO COMPANY ("MONSANTO")** is a Delaware corporation with its principal place of business 800 N. Lindbergh Blvd., Saint Louis, MO, 63167-0001, USA. **MONSANTO** may be served by service on its registered agent for service of process, CORPORATION SERVICE COMPANY, 40 TECHNOLOGY PKWY SOUTH, #300, NORCROSS, Gwinnett County, GA, 30092, USA. **MONSANTO** is subject to the jurisdiction of this Court. Venue is proper in this Court.

14. Defendant **HUNTSMAN PETROCHEMICAL, LLC ("HUNTSMAN")** is a Delaware corporation with its principal place of business **10003 Woodloch Forest Dr, The Woodlands, TX, 77380, USA**. **HUNTSMAN** may be served by service on its registered agent for service of process, CORPORATION SERVICE COMPANY, 40 TECHNOLOGY PKWY SOUTH, #300, NORCROSS, Gwinnett County, GA, 30092, USA. **HUNTSMAN** is subject to the jurisdiction of this Court. Venue is proper in this Court.

15. Defendant **ZEP, INC. ("ZEP")** is a Georgia corporation with its principal place of business 3330 CUMBERLAND BLVD, SUITE 700, ATLANTA, GA, 30339, USA. **ZEP** may be served by service on its registered agent for service of process, REGISTERED AGENT SOLUTIONS, INC., 900 OLD ROSWELL LAKES PKWY, STE 310, ROSWELL, FULTON COUNTY, GA, 30092, USA. **ZEP** is subject to the jurisdiction of this Court. Venue is proper in this Court.

16. Defendant **BASF, CORPORATION. ("BASF")** is a Delaware corporation with its principal place of business 100 PARK AVENUE, FLORHAM PARK, NJ, 07932, USA. **BASF** may be served by service on its registered agent for service of process, REGISTERED AGENT CT

CORPORATION SYSTEM, 289 S CULVER ST, LAWRENCEVILLE, GA, 30046-4805, GWINNETT COUNTY, GEORGIA, USA. **BASF** is subject to the jurisdiction of this Court. Venue is proper in this Court.

17. Defendant **WHITAKER OIL COMPANY ("WHITAKER")** is a Georgia corporation with its principal place of business at 1557 MARIETTA RD NW, ATLANTA, GA, 30318. **WHITAKER** may be served by service on its registered agent for service of process, C B Whitaker III at 1557 MARIETTA RD NW, ATLANTA, Fulton County, GA, 30318, USA. **WHITAKER** is subject to the jurisdiction of this Court. Venue is proper in this Court.

18. Defendant **USHER TRANSPORT, INC ("USHER")** is a Kentucky corporation with its principal place of business in P.O. BOX 16310, Louisville, KY, 40256-0310, USA. **USHER** may be served by service on its registered agent for service of process, MITCHELL, BRUCE, at 3390 PEACHTREE ROAD, SUITE 520, Atlanta, Fulton County, GA, 30326, USA. **USHER** is subject to the jurisdiction of this Court. Venue is proper in this Court.

19. Defendant **DILLON LOGISTICS, INC. ("DILLON")** is an Illinois corporation with its principal place of business at 901 McClintock Dr,

Suite 300, Burr Ridge, IL, 60527, USA. **DILLON** may be served by service on its registered agent for service of process, CORPORATION SERVICE COMPANY, at 40 TECHNOLOGY PARKWAY SOUTH, SUITE 300, NORCROSS, Gwinnett County, GA, 30092, USA. **DILLON** is subject to the jurisdiction of this Court. Venue is proper in this Court.

20. **JAMES WRIGHT** ("**WRIGHT**") resides in Fulton County, Georgia. **WRIGHT** may be served at 22 Sandstone Lane, Sharpsburg, Georgia 30277. **WRIGHT** is subject to the jurisdiction of this Court. Venue is proper in this Court.

21. **JOSEPH CARSON** ("**CARSON**") resides in Fulton County, Georgia. **CARSON** may be served at 4530 Jenkins Way, Douglasville, Georgia 30213. **CARSON** is subject to the jurisdiction of this Court. Venue is proper in this Court.

22. **KEN COOPER** ("**COOPER**") resides in Fulton County, Georgia. **COOPER** may be served at 6800 McLarin Rd, Fairburn, Fulton County, Georgia 30213. **COOPER** is subject to the jurisdiction of this Court. Venue is proper in this Court.

23. **JAMES PETWAY**("**PETWAY**") resides in Fulton County, Georgia. **PETWAY** may be served at 6800 McLarin Rd, Fairburn, Fulton County,

Georgia 30213. **PETWAY** is subject to the jurisdiction of this Court. Venue is proper in this Court.

24. **PAT HORN** ("**HORN**") resides in Fulton County, Georgia. **HORN** may be served at 6800 McLarin Rd, Fairburn, Fulton County, Georgia 30213. **HORN** is subject to the jurisdiction of this Court. Venue is proper in this Court.

25. **JOHNNY ROGERS** ("**ROGERS**") resides in Fulton County, Georgia. **ROGERS** may be served at 7010 Hope Creek Drive, Fairburn, Fulton County, Georgia 30125. **ROGERS** is subject to the jurisdiction of this Court. Venue is proper in this Court.

26. **SHAWN STEPHENS** ("**STEPHENS**") resides in Fulton County, Georgia. **STEPHENS** may be served at 6800 McLarin Rd, Fairburn, Fulton County, Georgia 30213. **STEPHENS** is subject to the jurisdiction of this Court. Venue is proper in this Court.

27. **KIM BARTHLOW** ("**BARTHLOW**") resides in Fulton County, Georgia. **BARTHLOW** may be served at 6800 McLarin Rd, Fairburn, Fulton County, Georgia 30213. **BARTHLOW** is subject to the jurisdiction of this Court. Venue is proper in this Court.

28. **STEPHANIE ROGERS ("S ROGERS")** resides in Fulton County, Georgia. **S ROGERS** may be served at 7010 Hope Creek Drive, Fairburn, Fulton County, Georgia 30125. **S ROGERS** is subject to the jurisdiction of this Court. Venue is proper in this Court.

29. **SHERMAINE THRASH ("THRASH")** resides in Fulton County, Georgia. **THRASH** may be served at 61 Bussey Court, Greenville, Georgia 30222. **THRASH** is subject to the jurisdiction of this Court. Venue is proper in this Court.

FACTS COMMON TO ALL CAUSES OF ACTION

30. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

31. **PHILLIPS** was employed by **TRIMAC DEFENDANTS** as a Wash Rack Technician in Atlanta and Fairburn, Georgia for 13 years from on or about 2006 until August 2019. **PHILLIPS** cleaned **DEFENDANTS'** tank trucks, railcars and other containers ("Confined Spaces") that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic chemicals.

32. **DEFENDANTS'** poisonous, lethal, carcinogenic chemicals last contained in Defendants' tank trucks, railcars and other containers

cleaned by **PHILLIPS** included, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI)** and **XYLENE** ("**CHEMICALS**").

33. While employed by **TRIMAC DEFENDANTS**, **PHILLIPS** worked in Confined Spaces with, handled, removed, and disposed of **DEFENDANTS' CHEMICALS**.

34. In August 2019, **PHILLIPS** was diagnosed with Blastoid Mantle Cell Lymphoma as a direct and proximate result of his repeated exposure to **DEFENDANTS' CHEMICALS**.

35. **PHILLIPS** has no family history of Blastoid Mantle Cell Lymphoma.

36. Lymphoma of this type is well-known to be caused by exposure to Defendants' lethal, poisonous and carcinogenic **CHEMICALS** to which **PHILLIPS** was exposed on a daily basis for over a decade while employed by **TRIMAC DEFENDANTS**.

37. **GLENN** was employed by **TRIMAC Defendants** as a Wash Rack Technician in Atlanta and Fairburn, Georgia for 18 years from on or

about 2000 until on or about April 2018. **GLENN** cleaned Defendants' tank trucks, railcars and other containers that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

38. **DEFENDANTS'** hazardous, poisonous, lethal, carcinogenic chemicals last contained in Defendants' tank trucks, railcars and other containers cleaned by **GLENN** included, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI)** and **XYLENE** ("**CHEMICALS**").

39. While employed by **TRIMAC Defendants**, **GLENN** worked in Confined Spaces with, handled, removed, and disposed of **DEFENDANTS' CHEMICALS**.

40. In February 2018 **GLENN** suffered a heart attack.

41. In 2019 **GLENN** was diagnosed with numerous health issues including, heart failure that requires a heart transplant, kidney failure that requires dialysis at least 3 times per week and a kidney transplant, insulin dependent diabetes, seizures, and blindness that has already

required 7 eye surgeries, all as a direct and proximate result of his repeated exposure to **DEFENDANTS' CHEMICALS**.

42. **GLENN** has no family history of heart disease, kidney disease, seizures, diabetes or blindness.

43. Disease processes of this type are well-known to be caused by exposure to **DEFENDANTS'** hazardous, lethal, poisonous and carcinogenic **CHEMICALS** to which **GLENN** was exposed on a daily basis for over a decade while employed by **TRIMAC DEFENDANTS**.

44. **HUDSON** was employed by **TRIMAC DEFENDANTS** as a Wash Rack Technician in Atlanta and Fairburn, Georgia for 10 years from on or about 2005 until August 2015. **HUDSON** cleaned **DEFENDANTS'** tank trucks, railcars and other containers that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic chemicals.

45. **DEFENDANTS'** poisonous, lethal, carcinogenic chemicals last contained in Defendants' tank trucks, railcars and other containers cleaned by **HUDSON** included, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC**

ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI) and **XYLENE** ("**CHEMICALS**").

46. While employed by **TRIMAC DEFENDANTS**, **HUDSON** worked in Confined Spaces with, handled, removed, and disposed of **DEFENDANTS' CHEMICALS**.

47. In 2020, **HUDSON** was diagnosed with Vitiligo as a direct and proximate result of his repeated exposure to **DEFENDANTS' CHEMICALS**.

48. HUDSON has no family history of Vitiligo.

49. Vitiligo is well-known to be caused by exposure to Defendants' lethal, poisonous and carcinogenic **CHEMICALS** to which **HUDSON** was exposed on a daily basis for over a decade while employed by **TRIMAC DEFENDANTS**.

50. **TRIMAC** is an international trucking company that is publicly traded with revenues exceeding $400 million in 2019. **TRIMAC** employs over 1,800 people. **TRIMAC** owns or leases at least 100 tank truck cleaning facilities in the United States.

51. **TRIMAC** operates 2 of its tank truck cleaning facilities in Atlanta in Fulton County at 605 Selig Drive SW, Atlanta, Fulton County, Georgia

30336, and 6800 McLarin Road, Fairburn, Fulton County, Georgia,[1] where **TRIMAC** provides transfer and storage of **DEFENDANTS' CHEMICALS**, interior tank cleaning, limited interior railcar cleaning and exterior cleaning of tank trailers and trucks.[2]

52. **TRIMAC** also transports **DEFENDANTS' CHEMICALS** for **DEFENDANTS**.

53. **BASF** is a multinational chemical company and the largest chemical producer in the world. **BASF** comprises subsidiaries and joint ventures in more than 80 countries and operates 6 integrated production sites and 390 other production sites in Europe, Asia, Australia, the Americas and Africa. BASF has customers in over 190 countries and supplies products to a wide variety of industries.

54. At the end of 2019, **BASF** employed 117,628 people. In 2019, **BASF** posted sales of €59.3 billion and income from operations before special items of about €4.5 billion.

55. **CHEMICALS** manufactured by **BASF** include, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC,**

[1] Trimac Pollutant Management Plan (PMP) p 5 of 16, 2.1 Facility Location [Exhibit 1]
[2] Trimac Pollutant Management Plan (PMP) p 5 of 16, 2.2 Facility Operation

FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI) and **XYLENE** ("**CHEMICALS**").

56. **BAYER** is a multinational pharmaceutical and life sciences company and one of the largest pharmaceutical companies in the world. Bayer's areas of business include human and veterinary pharmaceuticals, consumer healthcare products and agricultural chemicals.

57. On June 7, 2018, **BAYER** completed the purchase of **MONSANTO** for $66 Billion cash as part of **BAYER'S** Crop Science division. Bayer's Crop Science division develops pesticides.

58. **MONSANTO** was an American agrochemical and agricultural biotechnology corporation founded in 1901. **MONSANTO** developed **ROUNDUP®**, a glyphosate-based herbicide, in the 1970s.

59. **CHEMICALS** manufactured by **MONSANTO** include **ROUNDUP** ® (Glyphosate).

60. **MONSANTO'S** previous product brand names were maintained.

61. In June 2020, **BAYER** agreed to pay numerous settlements in lawsuits involving Monsanto products **ROUNDUP®**, PCBs and dicamba.

62. **DOW** is an American multinational chemical corporation headquartered in Midland, Michigan. **DOW** is among the three largest chemical producers in the world.

63. Dow manufactures plastics, chemicals, and agricultural products. With a presence in about 160 countries, **DOW** employs about 54,000 people worldwide. Dow has been called the "chemical companies' chemical company" as its sales are to other industries rather than directly to end-use consumers.

64. **CHEMICALS** manufactured by **DOW** include, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI)** and **XYLENE** ("**CHEMICALS**").

65. **DUPONT** is an American company formed by the merger of Dow Chemical and E. I. du Pont de Nemours and Company on August 31, 2017, and the subsequent spinoffs of Dow Inc. and Corteva. With 2018

total revenue of $86 billion, **DUPONT** has been headquartered in Wilmington, Delaware, since its founding in 1802.

66. Within 18 months of the merger DowDuPont was split into 3 publicly traded companies with focuses on agriculture (Corteva), materials science (**DOW** Inc.), and specialty products (**DUPONT**).

67. **CHEMICALS** manufactured by **DUPONT** include, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI)** and **XYLENE** ("**CHEMICALS**").

68. **HUNTSMAN** is an American multinational manufacturer and marketer of chemical products for consumers and industrial customers. Huntsman manufactures assorted polyurethanes, performance products, and adhesives. With headquarters in The Woodlands, Texas **HUNTSMAN** operate more than 70 manufacturing, R&D and operations facilities in over 30 countries and employs approximately 9,000 associates across

four business divisions. Huntsman Corporation had revenues of approximately $7 billion in 2019.

69. **CHEMICALS** manufactured by **HUNTSMAN** include, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate), STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI)** and **XYLENE** ("**CHEMICALS**").

70. **ZEP** produces and distributes chemical products including detergents, disinfectants, degreasers, lubricants, finishes, polishes, and pest control products. **ZEP** serves transportation, food and beverage, industrial, institutional, and laundry industries.

71. **CHEMICALS** manufactured by **ZEP** include, among others, **ACRYLATE, ALUMINUM SULFATE, AMMONIA, BENZENE, CAUSTIC, FORMALDEHYDE, METHYLENE, METHYLENE DIPHENYL DIISOCYANATE (MDI), NAPHTHA, HYDROCHLORIC ACID, 85% HYDROGEN PEROXIDE, NITRIC ACID, ROUNDUP® (Glyphosate),**

STYRENE, SULFURIC ACID, TOLUENE, TOLUENE DIISOCYANATE (TDI) and **XYLENE** ("**CHEMICALS**").

72. **TRIMAC, WHITAKER, USHER, DILLON, LANGER, LISK** and **MANFREDI** transported codefendants hazardous, poisonous, lethal and carcinogenic **CHEMICALS** and presented tank trucks containing **DEFENDANTS' CHEMICALS** to **TRIMAC'S** Atlanta facilities for cleaning.

73. **BAYER**, **DOW, DUPONT, MONSANTO, HUNTSMAN, ZEP, BASF, TRIMAC, WHITAKER, USHER, DILLON, LANGER, LISK** and **MANFREDI** employed **TRIMAC** and individual co-defendants, to transport codefendants **CHEMICALS** and clean tank trucks, railcars and other chemical containers that last contained **DEFENDANTS'** liquid and dry, poisonous, lethal, carcinogenic **CHEMICALS**.

74. **TRIMAC** and individual Defendants in turn employed Plaintiffs, without legally required training regarding hazardous chemicals and Personal Protective Equipment (PPE) and in violation of numerous state and federal laws to clean tank trucks, railcars and other Confined Spaces owned and operated by Defendants that, unbeknownst to

plaintiffs, last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

75. **TRIMAC Defendants** cleaned 36 to 50 tank trucks per day that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS** at their 2 Atlanta facilities alone.

76. Plaintiffs cleaned 16 to 25 tank trucks per day that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

77. Interior tank truck and railcar cleaning required Plaintiffs, among other things, to work in Confined Spaces with, handle, remove and dispose of **DEFENDANTS'** last contained **CHEMICALS**.

78. Plaintiffs handled, cleaned and removed **DEFENDANTS' CHEMICALS** from **DEFENDANTS'** tank trucks, railcars and other containers. These Confined Spaces were inadequately ventilated and cleaned without respirators or any other legally required PPE.

79. Without PPE and in violation of state and federal laws, Plaintiffs cleaned **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS** from **DEFENDANTS'** Confined Spaces using grinders, hammers and chisels. Plaintiffs did so for hours without a break, without adequate ventilation, without legally required respirators, training or PPE.

DEFENDANTS' CHEMICALS thus removed included, among others, **DOW's** hardened TDI and MDI.

80. Unbeknownst to Plaintiffs, **DEFENDANTS** routinely falsified documents including, among others, Wash Tickets, Wash Requests, Wash Rack Work Orders and Tank Entry Forms ("Wash Rack Documents")[3] thereby knowingly misrepresenting to Plaintiffs and others that **DEFENDANTS' CHEMICALS** last contained in Defendants' tank trucks, railcars and other containers prior to Plaintiffs' cleaning were safe and "nonhazardous;"

81. Defendants routinely wrote on Tank Entry Forms that **DEFENDANTS'** last contained **CHEMICALS** were "Nonhazardous" and safe for Plaintiffs to clean without legally required PPE when in reality **DEFENDANTS' CHEMICALS** were hazardous, poisonous, lethal and carcinogenic.

82. **DEFENDANTS** fraudulently circumvented state and federal law by unlawfully and improperly handling and disposing of poisonous, lethal, carcinogenic **CHEMICALS** that Defendants were not lawfully permitted to remove, handle or dispose of.

[3] See Exhibit 2, Tank Entry Forms.

83. Plaintiffs seek injunctive and monetary relief on behalf of Plaintiffs and others for cleaning **DEFENDANTS'** tank trucks, railcars and other containers without legally required PPE that, unbeknownst to Plaintiffs, last contained **DEFENDANTS'** hazardous, poisonous, lethal, carcinogenic **CHEMICALS** that **TRIMAC** Defendants were not lawfully permitted to clean.

84. **DEFENDANTS** falsified Wash Rack Documents that **DEFENDANTS** are legally required to maintain by state and federal agencies regarding the handling, cleaning and disposal of **DEFENDANTS'** lethal, poisonous, carcinogenic **CHEMICALS**.

85. By falsifying Wash Rack Documents and not providing legally required PPE, **DEFENDANTS** lower their handling and disposal costs while unlawfully exposing Plaintiffs to **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

86. **DEFENDANTS,** on at least two occasions, knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device material facts; made false, fictitious, and fraudulent statements and misrepresentations; and made and used false writings and documents, knowing the same to contain false, fictitious, and fraudulent statements

and entries, in a matter within the jurisdiction of departments and agencies of Georgia and Georgia state government and of the government of a county, city, or other political subdivision of Georgia in violation of OCGA 16-10-20.

87. By misrepresenting to Plaintiffs that **DEFENDANTS'** last contained **CHEMICALS** were safe and "nonhazardous," **DEFENDANTS'** fraudulently induced Plaintiffs, among other things, to do the following.

87.1. Fraudulently induced Plaintiffs to enter and remain in permit-required Confined Spaces that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS** without legally required training, PPE, adequate ventilation or respirators.

87.2. Fraudulently induced Plaintiffs to remain in permit-required Confined Spaces that last contained Defendants' poisonous, lethal, carcinogenic **CHEMICALS** for several hours without leaving or retesting the confined space as required at least every 30 minutes and without adequate ventilation or respirators.

87.3. Fraudulently induced Plaintiffs to use hammers, chisels and grinders to remove **DEFENDANTS'** hardened, poisonous, lethal,

carcinogenic **CHEMICALS** in permit-required Confined Spaces for several hours without leaving, without adequate ventilation and without respirators.

87.4. Fraudulently induced Plaintiffs to enter permit-required Confined Spaces that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS** without legally required training on health hazards related to atmospheric **CHEMICALS** in the workplace.

87.5. Fraudulently misrepresented to Plaintiffs the respiratory hazards from the poisonous **CHEMICAL**-laden tank trucks, thereby fraudulently inducing Plaintiffs to work and remain in **DEFENDANTS'** Confined Spaces with Defendants' hazardous **CHEMICALS** without legally required PPE.

87.6. Fraudulently induced Plaintiffs to clean **CHEMICAL**-laden tank trucks by falsifying documents in their efforts to hide from Plaintiffs and others the dangers of Defendants' tank trucks, railcars and other containers, and the dangers associated with **DEFENDANTS'** last contained poisonous, lethal and carcinogenic **CHEMICALS**.

87.7. Fraudulently induced Plaintiffs to work without legally required PPE while exposed to **DEFENDANTS' h**azardous, poisonous, lethal and carcinogenic **CHEMICALS**.

EQUITABLE TOLLING OF APPLICABLE STATUTE OF LIMITATIONS

88. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

89. The running of any statute of limitations has been tolled by reason of Defendants' fraudulent concealment. Defendants, through their affirmative misrepresentations and omissions, actively concealed from Plaintiffs the true risks associated with handling and disposing of poisonous, lethal carcinogenic **CHEMICALS**.

90. At all relevant times, Defendants maintained that their poisonous, lethal, carcinogenic **CHEMICALS** were safe, non-hazardous, and non-carcinogenic.

91. As a result of Defendants' actions, Plaintiffs were unaware, and could not reasonably know or have learned through reasonable diligence, that contact with **DEFENDANTS'** poisonous **CHEMICALS** exposed Plaintiffs to the risks alleged herein and that those risks were the direct and proximate cause of Defendants' acts and omissions.

92. Furthermore, Defendants are estopped from relying on any statute of limitations because of their fraudulent concealment of the poisonous **CHEMICALS** and their true character, quality and nature of the poisonous **CHEMICALS**.

93. **DEFENDANTS** had a duty to disclose the true character, quality, and nature of the poisonous, lethal, carcinogenic **CHEMICALS** because this was non-public information over which Defendants had and continue to have exclusive control, and because Defendants knew that this information was not available to Plaintiffs. In addition, Defendants are estopped from relying on any statute of limitations because of their intentional concealment of these facts.

94. Plaintiffs had no knowledge that **DEFENDANTS** were engaged in the wrongdoing alleged herein. Because of the fraudulent acts of concealment of wrongdoing by **DEFENDANTS**, Plaintiffs could not have reasonably discovered the wrongdoing at any time prior. Plaintiff and medical professionals could not have afforded and could not have possibly conducted studies to determine the nature, extent, and identity of related health risks, and were forced to rely on only the **DEFENDANTS** representations. Accordingly, **DEFENDANTS** are

precluded by the discovery rule and/or the doctrine of fraudulent concealment from relying upon any statute of limitations.

FRAUD

95. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

96. From on or about 2005 to present, **DEFENDANTS** routinely falsified Wash Rack Documents including, among others, Wash Tickets, Wash Requests, Wash Rack Work Orders and Tank Entry Forms ("Wash Rack Documents") thereby knowingly misrepresenting to Plaintiffs and others that **DEFENDANTS' CHEMICALS** last contained in **DEFENDANTS'** tank trucks, railcars and other containers prior to Plaintiffs' cleaning were safe and "nonhazardous" for Plaintiffs to handle, clean and remove without legally required PPE.

97. Defendants furnished Plaintiffs with falsified Wash Rack Documents stating, *inter alia*, that **DEFENDANTS'** tank trucks, railcars and other containers last contained **CHEMICALS** were safe and "nonhazardous" and that Plaintiffs could safely handle, clean and remove **DEFENDANTS' CHEMICALS** without legally required PPE.

98. Defendants advised Plaintiffs that if they brought a tank truck back to the Wash Rack that it was safe to clean and that Plaintiffs were required to clean it or they would be fired and “to clock out and go home.”

99. Defendants then furnished Plaintiffs with falsified documents indicating that a safe, “nonhazardous” chemical was last contained in Defendants’ tank trucks that **DEFENDANTS’ CHEMICALS** could be safely handled and removed, and the tank trucks safely cleaned without legally required PPE.

100. Defendants repeatedly represented to plaintiffs that Defendants’ **CHEMICALS** were safe.

101. Defendants repeatedly represented to plaintiffs that Defendants’ **CHEMICALS** were “nonhazardous.”

102. Defendants knew their **CHEMICALS** were dangerous and the falsified Wash Rack Documents provided to Plaintiffs were false and intended that Plaintiffs rely on the false Documents to their detriment.

103. In reliance on Defendants’ misrepresentations, Plaintiffs cleaned Defendants’ tank trucks, railcars and other containers that last contained Defendants’ poisonous, lethal, carcinogenic **CHEMICALS**.

104. After spending years cleaning **DEFENDANTS'** tank trucks, railcars and other containers, plaintiffs were diagnosed with diseases caused by their long-term, repeated exposure to **DEFENDANTS' CHEMICALS**.

105. Defendants falsified documents and misrepresented to plaintiffs that Defendants' last contained **CHEMICALS** were safe and "Nonhazardous" and misrepresented the dangers associated with **DEFENDANTS' CHEMICALS**.

106. **DEFENDANTS** intentionally made certain representations to plaintiffs, knowing said representations were false at the time they were made.

107. **DEFENDANTS'** false representations included falsifying, among others, Wash Rack Documents and falsely claiming to Plaintiffs that Defendants' last contained chemicals were not dangerous, "nonhazardous" and safe to clean without legally required PPE.

108. Defendants' thereby fraudulently induced Plaintiffs to do the following:

108.1. Fraudulently induced Plaintiffs to enter permit-required Confined Spaces that last contained **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

108.2. Fraudulently induced Plaintiffs to remain in permit-required Confined Spaces with **DEFENDANTS' CHEMICALS** for hours without leaving, without adequate ventilation and without respirators.

108.3. Fraudulently induced Plaintiffs to use hammers, chisels and grinders to remove Defendants' hardened, poisonous, lethal, carcinogenic **CHEMICALS** in permit-required Confined Spaces for several hours without leaving, without adequate ventilation and without respirators and without legally required training or PPE.

108.4. Fraudulently induced Plaintiffs to enter permit-required Confined Spaces with **DEFENDANTS' CHEMICALS** without legally required training on health hazards related to **DEFENDANTS'** atmospheric **CHEMICALS** in the workplace.

108.5. Fraudulently misrepresented to Plaintiffs the respiratory hazards from **DEFENDANTS' CHEMICAL**-laden tank trucks thereby fraudulently inducing Plaintiffs to work and remain in **DEFENDANTS'** Confined Spaces with **DEFENDANTS' CHEMICALS**.

108.6. Fraudulently induced Plaintiffs by falsifying documents in their efforts to hide form Plaintiffs and others the dangers of tank trucks,

railcars and other containers that last contained **DEFENDANTS' CHEMICALS**.

108.7. Fraudulently induced Plaintiffs to work without legally required PPE when exposed to **DEFENDANTS' CHEMICALS**.

109. All such representations made by Defendants to Plaintiffs were false.

110. Defendants, and each of them, knew that these representations were false at the time they were made and at all times herein mentioned.

111. **DEFENDANTS**, and each of them, concealed the hazards of **DEFENDANTS' CHEMICALS** from Plaintiffs with the intent to induce Plaintiffs to handle and remove **DEFENDANTS' CHEMICALS,** and clean Defendants' tank trucks at a lower price with the intent to deceive and defraud Plaintiffs, in furtherance of their conspiracy between Defendants to have their tank trucks cleaned more cheaply.

112. Plaintiffs, in reliance on Defendants' representations, and in the belief that **DEFENDANTS'** last contained **CHEMICALS** were as represented by Defendants, safe and "nonhazardous," entered into Confined Spaces and remained there with **DEFENDANTS'** poisonous, lethal, carcinogenic **CHEMICALS**.

113. Had **DEFENDANTS** not misrepresented and concealed the dangers of their **CHEMICALS**, and Plaintiffs known the true facts, Plaintiffs would

not have handled or removed **DEFENDANTS' CHEMICALS** or cleaned **DEFENDANTS' CHEMICAL**-laden tank trucks.

114. **DEFENDANTS'** intentional misrepresentations and concealments were made knowingly to deceive and exploit plaintiffs as to an existing fact with the intent that Plaintiffs rely and act upon said misrepresentations without the material information thus concealed.

115. Plaintiffs, without any knowledge or indication that the misrepresentations were indeed false and without any indication from defendants that material information was being concealed from them, handled and removed **DEFENDANTS'** poisonous, lethal. carcinogenic **CHEMICALS** from Defendants' tank trucks, railcars and other Confined Spaces.

116. Plaintiffs have been injured and damaged by defendants' fraudulent misrepresentations and concealments in an amount to be determined.

117. **DEFENDANTS'** willful and fraudulent misrepresentations and concealments showed willful misconduct, malice, fraud, wantonness, and oppression with a specific intent to cause harm to plaintiff. Plaintiff therefore prays for exemplary and punitive damages for each said

fraudulent act in an amount to be determined to deter defendants from such wrongful and fraudulent conduct in the future.

118. Plaintiff should be awarded the expenses of litigation in this matter, including his attorney's fees, because defendants acted in bad faith during the course of the transaction.

GEORGIA'S RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT O.C.G.A. § 16-14-1 *ET SEQ.* ("GEORGIA RICO").

119. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

120. **Defendants,** on at least two occasions, knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device material facts; made false, fictitious, and fraudulent statements and misrepresentations; and made and used false writings and documents, knowing the same to contain false, fictitious, and fraudulent statements and entries, in a matter within the jurisdiction of departments and agencies of Georgia and Georgia state government and of the government of a county, city, or other political subdivision of Georgia in violation of OCGA 16-10-20.

121. Defendants' conduct violates Georgia's Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. § 16-14-1 *et seq.* ("Georgia RICO").

122. Defendants' violations of Georgia's Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. § 16-14-1 *et seq.* ("Georgia RICO") proximately caused Plaintiffs damages.

123. As a proximate result of Defendants' acts and omissions, plaintiffs suffered injuries and damages.

PRODUCT LIABILITY

124. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

1. DESIGN AND MANUFACTURING DEFECTS

125. From on or about 2006 and 2013 respectively to present Plaintiffs cleaned Defendants' tank trucks, railcars and other containers at **TRIMAC** facilities in Fulton County, Georgia.

126. Plaintiffs sustained permanent debilitating injuries as a result of their long term and continuous exposure to Defendants' above-described **CHEMICALS**.

127. Plaintiff's injuries were the proximate result of design and manufacturing defects which existed when Defendants' chemicals were first released to the marketplace by Defendants.

128. The **CHEMICALS**, when manufactured and sold by Defendants, were not merchantable and reasonably suited to the use intended, and defendant is strictly liable for defects in the said chemicals under O.C.G.A. § 51-1-11.

129. As a proximate result of Defendants' acts and omissions, plaintiffs suffered injuries and damages

130. Plaintiffs are entitled to recover from Defendants for medical expenses, lost wages, and pain and suffering in an amount to be determined at trial.

2. NEGLIGENCE AND FAILURE TO WARN

131. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

132. Plaintiffs show that Defendants were negligent in the designing, testing, manufacturing, sale, and distribution of the **CHEMICALS** and in failing to warn plaintiffs and others of the dangerous properties, propensities, characteristics, and design of the subject **CHEMICALS**.

133. The negligence of **DEFENDANTS** was the proximate cause of Plaintiffs injuries and damages.

134. Plaintiffs are entitled to recover from Defendants for their medical expenses, lost wages, and pain and suffering in an amount to be determined at trial.

3. WILLFUL CONCEALMENT OF KNOWN DEFECTS

135. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

136. Defendant's negligence and willful concealment of known defects showed willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequences. Plaintiff therefore prays for additional exemplary and punitive damages in an amount to be determined deter defendant from such wrongful conduct in the future.

137. As a proximate result of Defendants' acts and omissions, plaintiffs suffered injuries and damages.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

138. Plaintiffs reallege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth again here.

139. Defendants' conduct was intentional and reckless.

140. Defendants' intentional conduct was extreme and outrageous.

141. Defendants' intentional, extreme and outrageous conduct proximately caused Plaintiffs' emotional distress.

142. Plaintiffs' emotional distress was severe and so outrageous in character, and so extreme in degree, as to go well beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

143. Defendants knew, or should have known, that their fraud and failure to exercise due care would cause plaintiffs' severe emotional distress.

144. As a proximate result of Defendants' acts and omissions, plaintiffs suffered severe emotional distress, injuries and damages.

DAMAGES

145. WHEREFORE, plaintiffs pray that they have judgment against defendants as follows:

145.1. That plaintiffs have judgment in an amount to be determined, but in excess of $30,000,000 each, in actual damages, plus reasonable attorney's fees and all court costs.

145.2. That plaintiffs have judgment for exemplary and punitive damages in an amount to be determined.

145.3. Defendants' willful and fraudulent misrepresentations and concealments showed willful misconduct, malice, fraud, wantonness, and oppression with a specific intent to cause harm to plaintiff. Plaintiff therefore prays for exemplary and punitive damages for each said fraudulent act in an amount to be determined to deter defendants from such wrongful and fraudulent conduct in the future.

145.4. Plaintiffs should be awarded the expenses of litigation in this matter, including attorney's fees, because defendants acted in bad faith during the course of the transaction.

145.5. For general damages for severe emotional distress and mental suffering to be determined by enlightened conscious of impartial jurors.

145.6. That plaintiffs have such other and further relief as is just and proper.

This 8th day of December 2020.

/s/James Hugh Potts II
James Hugh Potts II

JHPII
We Win. Things Change.

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POLLUTANT MANAGEMENT PLAN

TRIMAC TRANSPORTATION INC.
NATIONAL TANK SERVICES

FAIRBURN FACILITY
6800 MCLARIN ROAD
FAIRBURN, GA 30213

TABLE OF CONTENTS

1. Introduction and Certification

This Pollutant Management Plan (PMP) was developed in accordance with the guidance in 40 CFR 442.15(b) for compliance with the pretreatment standards for the Transportation Equipment Cleaning Point Source Category. National Tank Services/Trimac Transportation Inc. (NTS/Trimac) will conduct its operations as described in this PMP. The PMP will be submitted for approval to the local control authority. After approval, the Pretreatment Department approval letter will be included in Appendix A.

National Tank Services / Trimac Transportation is committed to this plan and certifies that it will utilize this PMP for compliance with the pretreatment standards for the Transportation Equipment Cleaning Category.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Karlan Kim Barthlow
National Tank Services/Trimac Transportation

March 18, 2019

2. Facility Description

2.1.Facility Location

NTS/Trimac/ operates a tank truck cleaning facility at 6800 McLarin Road, Fairburn, GA. The facility is located in an industrial area. The site is approximately 28 acres, and is comprised of parking, a three bay wash facility, a wastewater treatment facility, a four bay maintenance shop, rail tracks, transfer and storage facilities, dispatch and multiple administrative offices. A site location map is included as Exhibit 1.

2.2.Facility Operation

Trimac Transportation provides transportation and maintenance services for both liquid and dry bulk chemicals. Trimac also provides transfer and storage of bulk chemicals, interior tank cleaning, limited interior railcar cleaning and exterior cleaning and brightening of tank trailers and trucks. Tank trailers that are to be cleaned are dropped off and picked up by Trimac personnel as well as other commercial customers that require those services.

2.3.Wastewater Management

A physical/chemical batch process is used for treatment of industrial wastewater generated from facility operations. Treatment is continuous and occurs 8 hours per day, 5 days per week. Approximately 5500 gallons per day is discharged to the POTW. Wastewater discharged from the Trimac/NTS industrial pretreatment facility is continuously monitored and flow recorded using a Flowmotion FM Series 8000 Ultrasonic open Channel Flow Meter, 22 1/2-degree weir box. Treatment consists of primary separation, oil removal, equalization, pH adjustment, coagulation, flocculation, gravity separation/clarification, and solids dewatering. The pre-treatment system is operated by 1- trained Trimac employee and 1- Georgia Class 3 licensed operator.

2.4.Wastewater Pre-Treatment Process Description

Primary separation is accomplished both with trench drains that collect heavy particles at the source and also through an API separator that collects additional solids and is equipped with an oil skimmer and oil collection tank. Two equalization tanks are used to equalize or balance contaminant concentrations in the influent wastewater, providing a relatively consistent flow of contaminants to the downstream treatment system resulting in a more efficient treatment operation. Wastewater is pH adjusted for two reasons 1) to cause metals and other contaminants to precipitate out of solution and 2) to neutralize excess acid or caustic that may exist in the waste water. Coagulants and flocculants are added to form large particles (floc) that sweep smaller particles out of the solution and promote rapid settling. These larger particles (floc) move through the system into the clarifier were the floc which now contains the contaminants will settle out to form a sludge layer on the bottom of the clarifier. Periodically the sludge that is formed is removed from the clarifier to a sludge holding tank. After transferring the sludge from the clarifier to the sludge holding tank the sludge is allowed to settle again and the excess

water is decanted and returned to the head of the treatment system. When the sludge holding tank is has reached its capacity the sludge will be removed via vacuum truck and shipped off site to a properly permitted facility for treatment and/or disposal.

A wastewater treatment Process Flow Diagram is attached as Attachment A.

A basic preventative maintenance program is in place for the treatment system to maintain the pre-treatment system in good working order. The basic PM maintenance program is managed / performed by the pre-treatment system operator/s. Maintenance required beyond the PM program is performed by qualified outside vendors.

3. Truck Cleaning Operations

3.1.Identify Cargo

Upon receiving an empty tank trailer for cleaning, the contents last delivered by the tank truck are determined. The customer supplies a copy of the shipping manifest, bill of lading and Safety Data Sheets (SDS) for the last material hauled on the tank truck. This information is used in determining POTW compatibility, the management method for any residual material (heel) in the tank truck, and the proper tank cleaning solution to be used. The POTW has the final authority in determining compatibility when there is a product that is questionable as to its compatibility with the POTW. All residual material (heel) from the tank truck will be containerized, stored, and shipped off site to a properly permitted facility for treatment or disposal.

Traffic Supervisors and Cleaning technicians will notify the Facility Manager if a new or unknown chemical product is being received at the facility. Heels or retain will be fully drained and placed into separate on site storage for offsite disposal or will be returned to the shipper. All spent cleaning solutions, including interior caustic cleaning solutions, presolve cleaning solutions and interior detergent cleaning solutions, shall be segregated from other wastewaters and disposed of separately when necessary to ensure that they do not cause or contribute to a discharge that would be incompatible with treatment system at the POTW.

Presently all rail car interior cleaning activities are suspended. When rail car washing resumes it is limited to latex based products that are known to be compatible with the POTW and treatable by the Trimac/NTS pre-treatment system.

3.2.Heel Management

Based on the shipping manifest for the most recently shipped material (and other appropriate information), the proper heel management technique (e.g., storage in drums for disposal off site and/or return to the carrier) will be determined.

All tank trucks that are requested to be cleaned shall be inspected for residual material (heel). The amount of residual material is dependent on product/material characteristics. Not all tank trucks will contain residual material (heel).
Tank trucks with excessive amounts of residual material (heel) will be returned to the customer.

Quantities of heel that are not considered excessive will be drained from the trailer and placed into an appropriate container before the trailer is cleaned or pre-rinsed.

Small quantities of heel that are considered compatible with the POTW and that are easily neutralized, removed, or treated by the Trimac pre treatment system will be directed to the pre treatment system and treated as described in Section 2.3 Wastewater Management

Using information collected under Section 3.1, the determination of whether the rinse water is a POTW compatible or incompatible material will be made. In general,

materials that are not water-soluble and multi phase materials are incompatible. Many water-soluble materials are POTW compatible.

Compatible pollutants are materials that are compatible with the POTW, e.g., food materials and some detergents. Also, rinse waters that contain materials (e.g., acids, bases, and oils) that are initially considered incompatible with the POTW, but that can be effectively neutralized or removed by the Trimac waste water pretreatment system will be treated and discharged to the POTW.

Incompatible pollutants are materials which are incompatible with the POTW and which cannot be effectively removed by the Trimac pre treatment system (e.g., pesticides, some emulsified oils). The heel from a tank truck, which last hauled an incompatible pollutant, will not be treated on site. Incompatible materials will be containerized, stored, and shipped off site to a properly permitted facility for treatment and/or disposal.

Presently all railcar interior cleaning activities are limited to latex based products that are known to be compatible with the POTW and treatable by the Trimac/NTS pre-treatment system. All residual material (heels) removed from the railcar prior to cleaning are containerized, stored, and shipped off site to a properly permitted facility for treatment or disposal.

3.3.Pre-Rinse

Thick, viscous, or tacky materials are difficult to remove from the tank truck. In addition, some tank trucks are not sloped to a central sump making complete removal of residual material difficult. In these cases a pre-rinse solution (frequently hot water and steam) is introduced to the tank truck to promote removal of residual materials. Pre-rinse is managed similarly to heel. Information collected under Section 3:1 is used to determine POTW compatibility and the management that assures regulatory compliance. All wastewater resulting from a pre-rinse of the inside of the tank trucks, which previously held material incompatible with the treatment process at the POTW, will be containerized, stored, and shipped off site to a properly permitted facility for treatment or disposal.

3.4.Cleaning Solutions

After heel management and pre-rinse, if required, an appropriate cleaning solution is selected based on the residual material to be cleaned. Frequently cleaning solutions are heated to improve performance. The cleaning solution is applied using an orbital tank cleaning machine (spinner) and is typically re-circulated from the cleaning solution vat to the tank truck and back to the cleaning solution vat. Cleaning solutions are reused on multiple tank trucks as much as feasibly possible. When the reused cleaning solutions are "spent" no longer effective for cleaning they are containerized, stored and disposed of off-site to a properly permitted facility for treatment and/or disposal. Detergent based cleaning solutions that can be effectively neutralized or

removed by the Trimac pre-treatment system will be treated and discharged to the POTW. SDS information is located in Trimac/NTS facility.

3.4.1 Aqueous Cleaner

A water and cleaner solution is typically utilized to wash trailers that contained materials such as acids, bases, petroleum products, latex paint, amines and acrylates.

3.4.2 Solvent Cleaner

A solvent-based product is typically utilized to wash trailers that contained materials such as epoxy or enamel coatings, etc.

3.5 Rinse

After cleaning, the trailer is rinsed, usually with water, and inspected. Occasionally additional cleaning or manual spot cleaning is necessary. Upon passing final inspection the truck trailer is ready for use by the customer and pickup can be scheduled.

4. Waste Management

4.1.POTW Compatible Wastes

The final rinse and other wastewater streams, which are classified as compatible, are collected and treated in the NTS/Trimac wastewater pre-treatment system.

4.2.POTW Incompatible Wastes

Incompatible wastes are collected in (drums, bulk containers, and roll-off boxes) and labeled appropriately. Employees will label drums or totes and classify them as hazardous and non hazardous waste. These materials are containerized, stored and shipped of off-site to a properly permitted facility for treatment and/or disposal.

4.3.Recycling and Reuse

In some cases the heel and pre-rinse may be suitable for treatment at NTS/Trimac. Examples include caustic (used in truck cleaner) and acids used to neutralize excess caustic in the wastewater treatment plant. Where possible, such chemicals will be recycled for their appropriate use.

5. Chemical Management

The Trimac facility utilizes brighteners and detergents. SDS for all cleaning agents are available at the site for inspection.

Trimac/NTS prefers to utilize nontoxic or less toxic cleaning compounds where possible to minimize potential adverse effects on its pretreatment system, the POTW, and the environment in general. Where possible, aqueous solutions are used rather than solvents. Information related to volumes, content and chemical characteristics of all agents used in cleaning and brightening operations are available for review at the facility.

Other waste minimization measures include minimizing the amount of hazardous waste generated through the use of nonhazardous solvents, minimizing the amount of heel in incoming trucks, and using the minimum effective amount of solvent or water for cleaning.

6. Plan Administration, Training, Records

6.1.PMP Modifications

In the event of modification to pollution control system or modification to the wastewater discharge permit, the PMP will be appropriately modified submitted for review and approval.

6.2.PMP Training

The Trimac/NTS facility manager is responsible for ensuring that all employees are trained in the requirements of this plan and that work practices at this facility are in compliance with this plan. At least annually, all employees will be trained on the requirements of the PMP. New employees will be trained in the requirements of this plan before they are allowed to work, except under the direct supervision of an experienced coworker or supervisor. This plan will be utilized as the training material. When approved, all employees will be trained and records of training will be kept at the facility.

6.3.PMP Recordkeeping

Trimac/NTS will maintain records on truck trailers received for washing including the former contents of each truck trailer, heel management, any hazardous waste generated and employee training on the requirements of this plan.

Any manifest utilized to dispose of any waste off-site will be maintained at the facility for a period of at least three years. This will include manifests from waste disposal including sludge, spent carbon filter media, oily water from oil and water separator, left-over heel material incompatible with treatment at the POTW, all wastewaters shipped off-site resulting from the cleaning of tanks which held material incompatible with treatment at the POTW.

Copies of customer supplied bills of lading are maintained in an electronic data base by Trimac/NTS for a minimum of three years.

A list of compatible rinse waters from products discharged to the POTW, including cleaning solutions and material residue will be maintained on-site and updated as required. SDS information is available on-site electronically.

7. Emergency Procedures

NTS/Trimac has documented emergency procedures and a spill contingency plan at the facility. These are available any time for review by the control authority.

7.1.Responsible Employees

Name	Title	Phone / Office	Phone / Cell
Joe Menard	NTS Service Manager	(770)-969-9177 ext. 255	404-831-7367
Ken Cooper	NTS Director	(770)-969-9177 ext 114	678-876-2004
Christopher French	Waste Water Treatment Operator	(770)-969-9177 ext. 225	678-778-6626
Kim Barthlow	Property & Environmental Manager	(770) 964-4848 ext. 212	(404) 822-8062

7.2.Leak and Spill Prevention and Countermeasures

Cleaning and other chemicals used in the NTS/Trimac tank truck cleaning process are purchased in drums or totes and stored in a contained chemical storage area near the wash rack building. There are sumps with normally closed valves in the floor of the chemical storage area. Liquids that drain to the sumps can be routed to the head of the waste water pre treatment system, or if the liquids are not compatible with the POTW, the liquids can be manually pumped out of the sumps and into containerized storage, after which these materials can be shipped off-site to a properly permitted facility for treatment and/or disposal.

A spill kit (over-pack drum) including, gloves, goggles, Tyvek type coveralls, adsorbent materials, a container for spent adsorbent, air horn located in the wash rack building area. Fire extinguishers are located in all working areas of the washrack. A first aid kit is located in the wash rack office.

7.3.Discharge Permit Noncompliance

NTS/Trimac will notify the control authority immediately upon discovering an upset, malfunction, spill, accident or other incident that caused a discharge permit noncompliance. A written report on the incident that resulted in permit noncompliance will be submitted within 5 days of the incident. The written report will include information required to comply with the wastewater discharge permit.

- A description and evaluation of the cause of the incident. Include the location of the incident, information on the chemical discharged to the city, the time and date

it occurred and information on the quantity of chemical discharged and the amount of contaminated water discharged.

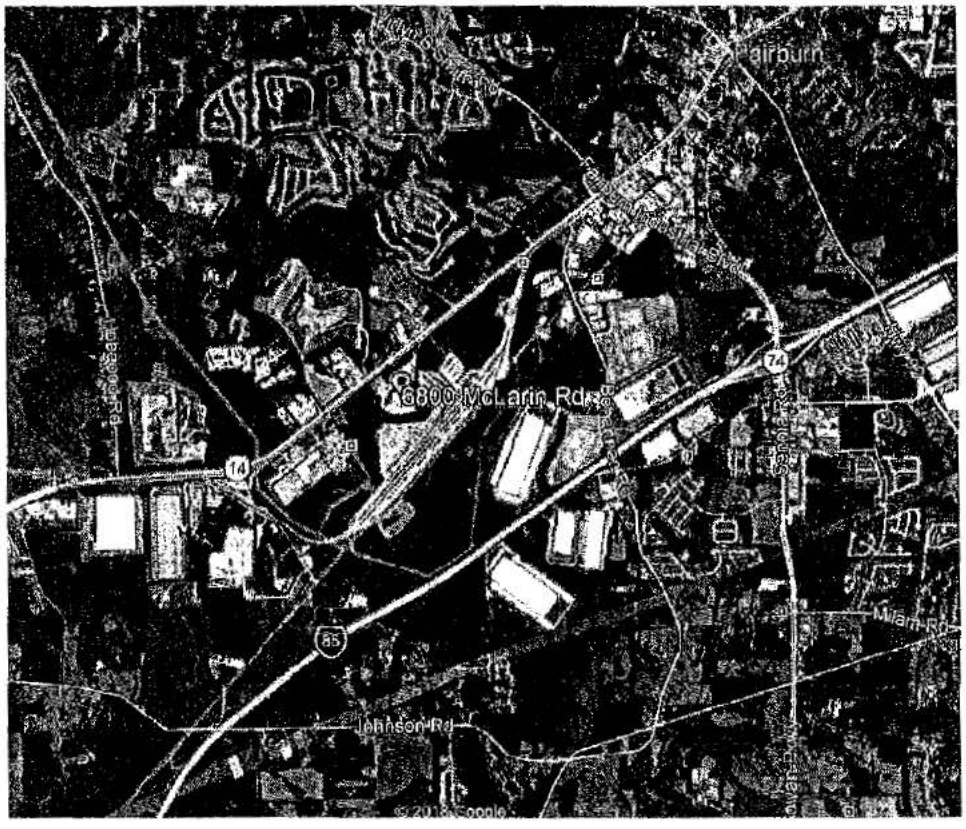
- The duration of the noncompliance including dates and times, and if still occurring, when compliance will be achieved.
- Proposed steps to prevent reoccurrence of the incident.

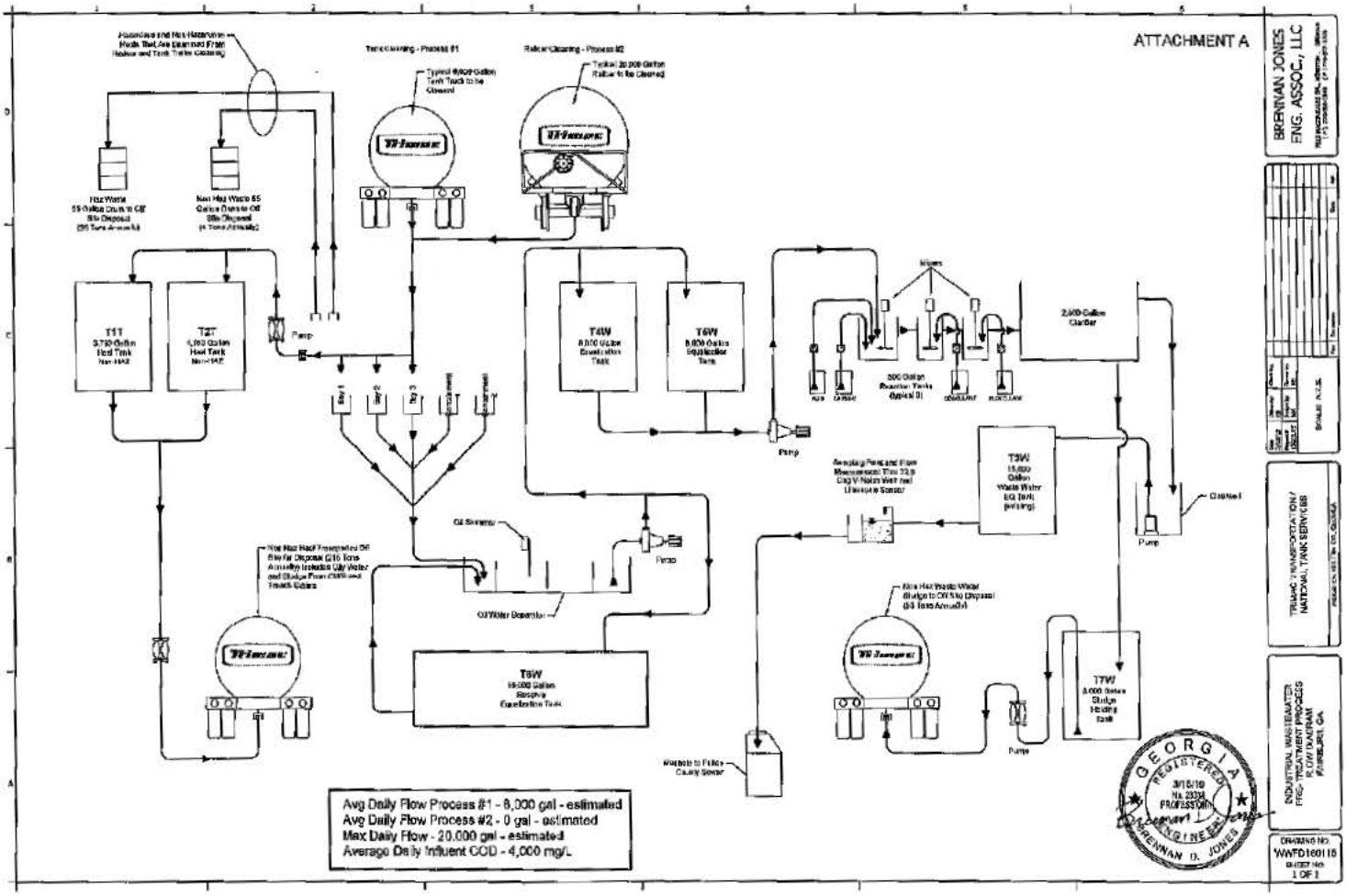
Contact numbers for the Camp Creek Water Reclamation Plant Authority:

(For Spills or Slug Discharge)
8:00 am – 5:00 pm M-F:
(770)-774-1638

24 Hr Contact M-S
Maintenance Manager: (770)-296-4214
Operations Manager: (770)-823-9042

Exhibit 1 – Site Location Map





BRENNAN JONES ENG. ASSOC., LLC

TRIUMF TRANSPORTATION / NATIONAL TANK SERVICES

INDUSTRIAL WASTEWATER PRE-TREATMENT PROCESS FLOW DIAGRAM FAIRBURN, GA

DRAWING NO. WWFD160115

SHEET NO. 1 OF 1

334485

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 5-31-16 Unit #: 47-0215 Time: 4:50 Branch: 345

Product Hauled Last: MDI / Dirty Duration of Permit: 2 HRS

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☑ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NON HAZ

REASON FOR ENTERING TANK ☑ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain)

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☑ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.8	20.8				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	4:50	4:55				

TIME OF ENTRY 4:55pm ANTICIPATED TIME OF EXIT 5:03pm

4. Signature of person conducting tests above:

Signature				
Print Name	ART FOWLER			

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank _____ Observer/Attendant

_____ Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 5-31-16

Form 1302 - Rev Mar/09 Printed in Canada

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

389951

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 6/28/19 Unit #: 470712 Time: 11:09 AM Branch: 267

Product Hauled Last: MDI Duration of Permit: 2hr

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) Non Haz

REASON FOR ENTERING TANK ☑ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines
2. Determine cleaning or purging activities performed since the trailer was used last.
   ☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☐ Other
3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)
   ☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9	20.9				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	11:14	11:38				

TIME OF ENTRY _____ ANTICIPATED TIME OF EXIT _____

4. Signature of person conducting tests above:

Signature	Josh Wynn	Josh Wynn		
Print Name	Josh Wynn	Josh Wynn		

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.
6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.
7. Visually inspect all safety and rescue equipment to ensure it is operating.
8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
- ☐ Ventilation Equipment
- ☐ Hearing Protection
- ☐ Water/Fire Extinguisher
- ☐ Gloves
- ☐ Welding Helmet
- ☐ Leather Work Boots
- ☐ Other (list) _____

Additional items required for cleaning:
- ☐ Gloves
- ☐ Coveralls
- ☐ Rubber Boots
- ☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.
10. Do not remain in a confined space for periods exceeding two hours.
11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.
12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.
13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.
14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**
15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: Dennis Phillips (Individual Entering the Tank) Josh Wynn (Observer/Attendant)

(Authorized Company Approval)

Reviewed by the Supervisor: _____ Date: _____

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

391750

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 5-5-20 Unit #: 472397 Time: 9:4 Branch: 267

Product Hauled Last: MDI Duration of Permit: 8hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) non H2S

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain)
Full clean prep

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☐ Flushed ☐ Detrex ☑ Other ME4

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9	20.8				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	9:33	9:59				

TIME OF ENTRY 10:02 ANTICIPATED TIME OF EXIT 12:02

4. Signature of person conducting tests above:

Signature				
Print Name	JEFFLOMM	JEFFLOMM		

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank. A267-200823(

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank
_____ Authorized Company Approval
_____ Observer/Attendant

Reviewed by the Supervisor: _____ Date: _____

324218

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 10-8-15 Unit #: 470898 Time: 130 pm Branch: 345

Product Hauled Last: Disocyanate Duration of Permit: 2hr

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) Non haz

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)
PM's

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☐ Flushed ☐ Detrex ☐ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☐ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9	20.9				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	1:26	1:36				

TIME OF ENTRY _____ ANTICIPATED TIME OF EXIT _____

4. Signature of person conducting tests above:

Signature					
Print Name	Ricky H	Ricky H			

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☑ Gloves
☑ Welding Helmet
☐ Leather Work Boots
☐ Other (list) grinder + life.

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ (Individual Entering the Tank) _____ (Observer/Attendant)

_____ (Authorized Company Approval)

Reviewed by the Supervisor: _____ Date: 10-8-15

Form 1302 - Rev Mar/09 Printed in Canada

324394

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 12/4/15 Unit #: 417277 Time: 1:55 PM Branch: 345

Product Hauled Last: STYRENE Duration of Permit: 2 HRS

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NONE THAT

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)
~~INSPECT~~ THICKNESS

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines
2. Determine cleaning or purging activities performed since the trailer was used last.
   ☐ Steamed ☐ Purged ☐ Flushed ☐ Detrex ☐ Other
3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)
   ☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9	20.9	20.9	20.9	20.9	19.5% - 23%
EXPLOSIVE	0	0	0	0	0	0%
TOXIC	0	0	0	0	0	As Per Data Sheet
TIME OF TEST	1155	1200	1210	1220	1230	

TIME OF ENTRY 12:05 ANTICIPATED TIME OF EXIT 2:05 PM

4. Signature of person conducting tests above:
   Signature
   Print Name Dwayne Hackley Dwayne Hackley Dwayne Hackley Dwayne Hackley Dwayne Hackley
5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.
6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.
7. Visually inspect all safety and rescue equipment to ensure it is operating.
8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☑ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☑ Leather Work Boots
☑ Other (list) LIGHT, THICKNESS TESTER

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.
10. Do not remain in a confined space for periods exceeding two hours.
11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.
12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.
13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.
14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**
15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank _____ Observer/Attendant

_____ Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 12-7-15

Form 1302 - Rev Mar/09 Printed in Canada

340003

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

Trimac

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 11-23-16 Unit #: 1371 Time: 7:30 Branch: A267

Product Hauled Last: BUTYL Acrylate Duration of Permit: 2 Hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NON-HAZ

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain)
VTK, Ih, Test

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☑ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9	20.9	20.9			19.5% - 23%
EXPLOSIVE	0	0	0			0%
TOXIC	0	0	0			As Per Data Sheet
TIME OF TEST	2:35	2:40	2:55			

TIME OF ENTRY 2:00 ANTICIPATED TIME OF EXIT 2:45

4. Signature of person conducting tests above:

Signature	Art Fawns	Art Fawns	Art Fawns	
Print Name	ART Fawns	ART Fawns	ART Fawns	

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank

Art Fawns Observer/Attendant

_____ Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 11-23-16

Form 1302 - Rev Mar/09 Printed in Canada

323845

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 2-26-16 Unit #: 903 Time: 6:20 Branch: 345

Product Hauled Last: ACID Duration of Permit: 2 HRS

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NON HAZ

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines
2. Determine cleaning or purging activities performed since the trailer was used last.
   ☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☑ Other
3. Test each trailer compartment, discharge valves, loading lines, all volded sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)
   ☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	21.1	20.9	20.9			19.5% - 23%
EXPLOSIVE	0	0	0			0%
TOXIC	0	0	0			As Per Data Sheet
TIME OF TEST	6:21	6:22	6:43P			

TIME OF ENTRY 6:43P ANTICIPATED TIME OF EXIT 7:01P

4. Signature of person conducting tests above:

Signature	Print Name			
Art Fawn	Art Fawn	Kris C. Santamaria		
Art Fawn	Art Fawn	Kris C. Santamaria		

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.
6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.
7. Visually inspect all safety and rescue equipment to ensure it is operating.
8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.
10. Do not remain in a confined space for periods exceeding two hours.
11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.
12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.
13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.
14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**
15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: Art Fawn (Individual Entering the Tank) Kris C. Santamaria (Observer/Attendant)

Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 3-2-16

334561

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 4-29-16 Unit #: R516 Time: 5:30 Branch: 345

Product Hauled Last: Caustic Duration of Permit: 2 Hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NON HAZ

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain)
VIK INSP

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☑ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.8	20.8				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	5:30	6:00				

TIME OF ENTRY 6:20 ANTICIPATED TIME OF EXIT 7:00

4. Signature of person conducting tests above:

Signature				
Print Name	ART FOWLER			

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
- ☐ Ventilation Equipment
- ☐ Hearing Protection
- ☐ Water/Fire Extinguisher
- ☐ Gloves
- ☐ Welding Helmet
- ☐ Leather Work Boots
- ☐ Other (list) _____

Additional items required for cleaning:
- ☐ Gloves
- ☐ Coveralls
- ☐ Rubber Boots
- ☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ (Individual Entering the Tank) _____ (Observer/Attendant)

_____ (Authorized Company Approval)

Reviewed by the Supervisor: _____ Date: 05-3-16

Form 1302 - Rev Mar/09 Printed in Canada

324263

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 10-5-15 Unit #: 16031 Time: 9:30 Branch: 345

Product Hauled Last: Ethelyne Duration of Permit: 2hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable

(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) Non-HAZ

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain) Inspection

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines
2. Determine cleaning or purging activities performed since the trailer was used last.
   ☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☐ Other
3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

   ☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.9%	20.9%	20.9%			19.5% - 23%
EXPLOSIVE	0	0	0			0%
TOXIC	0	0	0			As Per Data Sheet
TIME OF TEST	9:30 am	9:32	9:35 am			

TIME OF ENTRY 9:35 am ANTICIPATED TIME OF EXIT

4. Signature of person conducting tests above:

Signature					
Print Name	Jason D.	Jason D.	Jason D.		

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.
6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.
7. Visually inspect all safety and rescue equipment to ensure it is operating.
8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
- ☐ Ventilation Equipment
- ☐ Hearing Protection
- ☐ Water/Fire Extinguisher
- ☐ Gloves
- ☐ Welding Helmet
- ☑ Leather Work Boots
- ☑ Other (list) light / rubber boots

Additional items required for cleaning:
- ☐ Gloves
- ☐ Coveralls
- ☐ Rubber Boots
- ☐ Other (list)

9. The life line to the harness must be anchored outside the tank.
10. Do not remain in a confined space for periods exceeding two hours.
11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.
12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.
13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.
14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**
15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: Individual Entering the Tank _____ Observer / Attendant _____

Authorized Company Approval _____

Reviewed by the Supervisor: _____ Date: 10-13-15

Form 1302 - Rev Mar/09 Printed in Canada

323847

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

#2

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 2-25-16 Unit #: 702 Time: _____ Branch: 345

Product Hauled Last: SOLVENT Duration of Permit: 2Hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NON HAZ

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☑ Other: (explain)
VIKING

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☑ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	21.0	21.0	21.0			19.5% - 23%
EXPLOSIVE	0	0	0			0%
TOXIC	0	0	0			As Per Data Sheet
TIME OF TEST						

TIME OF ENTRY 10:05 ANTICIPATED TIME OF EXIT 10:48

4. Signature of person conducting tests above:

Signature	[signature]	[signature]	[signature]	
Print Name	ART FAWS	ART FAWS	[signature]	

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: [signature] Individual Entering the Tank _____ [signature] Observer/Attendant

[signature] Authorized Company Approval

Reviewed by the Supervisor: [signature] Date: 2-26-16

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323845

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

#7

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 2-26-16 Unit #: 903 Time: 6:20 Branch: 345

Product Hauled Last: caustic Duration of Permit: 2 Hrs

CHARACTERISTICS OF PRODUCT HAULED LAST: ☐ Toxic ☐ Explosive ☐ Flammable
(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) NaOH 2

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☐ Flushed ☐ Detrex ☑ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.1	20.9	20.9			19.5% - 23%
EXPLOSIVE	0	0	0			0%
TOXIC	0	0	0			As Per Data Sheet
TIME OF TEST	6:20	6:21	6:26P			

TIME OF ENTRY 6:26P ANTICIPATED TIME OF EXIT 6:40P

4. Signature of person conducting tests above:

Signature				
Print Name	ART FAWS2	ART FAWS2 Kris C. Santamaria		

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
☐ Ventilation Equipment
☐ Hearing Protection
☐ Water/Fire Extinguisher
☐ Gloves
☐ Welding Helmet
☐ Leather Work Boots
☐ Other (list) _____

Additional items required for cleaning:
☐ Gloves
☐ Coveralls
☐ Rubber Boots
☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank _____ Observer/Attendant

_____ Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 3-2-16

Form 1000 Rev. May/00 Printed in Canada

334628

Trimac

HAZARD EVALUATION REPORT AND HOT WORK PERMIT

(To be completed prior to all tank entries)

It is potentially harmful to human health to enter a hazardous confined space, or to be exposed to dangerous substances. The company policy prohibits any employee from entering tanks or handling dangerous substances without the written consent of the company.

Date: 6-28-16 Unit #: 496712 Time: 6:55 Branch: 345

Product Hauled Last: Nitric Acid Duration of Permit: 2 HR

CHARACTERISTICS OF PRODUCT HAULED LAST: ☑ Toxic ☐ Explosive ☐ Flammable

(Refer to Material Safety Data Sheet) ☐ Oxygen Deficient ☑ Other (specify) Corrosive

REASON FOR ENTERING TANK ☐ Cleaning ☐ Repairing ☐ Hot Work ☐ Other: (explain)

PRE-ENTRY PROCEDURES (To be completed by qualified person entering tank.)

1. Remove all caps and plugs, open manifolds, valves and domes and disconnect, or blank off, all supply lines

2. Determine cleaning or purging activities performed since the trailer was used last.
☐ Steamed ☐ Purged ☑ Flushed ☐ Detrex ☐ Other

3. Test each trailer compartment, discharge valves, loading lines, all voided sections and record last results as follows: (Each test must be repeated at intervals not to exceed two hours.)

☑ Tester has verified the meter is calibrated and is properly functioning per manufacturer's recommendations.

	Tester Pre-Test	First Test	Second Test	Third Test	Fourth Test	Allowable Limits
OXYGEN	20.8	20.7				19.5% - 23%
EXPLOSIVE	0	0				0%
TOXIC	0	0				As Per Data Sheet
TIME OF TEST	6:56	7:00				

TIME OF ENTRY 7:02 AM ANTICIPATED TIME OF EXIT 7:25 AM

4. Signature of person conducting tests above:

Signature D Craig Gates D Craig Gates

Print Name D Craig Gates D Craig Gates

5. If the above tests indicate acceptable levels for human survival, test ventilation equipment and position equipment in confined space to be entered.

6. If the above tests indicate non-complying limits, entry to the tank is not permitted under any condition.

7. Visually inspect all safety and rescue equipment to ensure it is operating.

8. Individuals entering any tank must wear the rescue harness, life line and other personal protective equipment, and carry with them an explosion proof light. The attendant / observer must have an air horn.

Additional items required for welding:
- ☐ Ventilation Equipment
- ☐ Hearing Protection
- ☐ Water/Fire Extinguisher
- ☐ Gloves
- ☐ Welding Helmet
- ☐ Leather Work Boots
- ☐ Other (list) _____

Additional items required for cleaning:
- ☐ Gloves
- ☐ Coveralls
- ☐ Rubber Boots
- ☐ Other (list) _____

9. The life line to the harness must be anchored outside the tank.

10. Do not remain in a confined space for periods exceeding two hours.

11. Review emergency and rescue procedures outlined on the reverse side of this form with the individual who is to act as the observer.

12. Enter the tank only after the observer is in place, required tests are completed, the appropriate safety equipment is in place and the authorized company approval is obtained.

13. The Observer must remain in verbal and/or visual contact throughout the duration of occupancy in the tank.

14. **Record any problems that occur during the course of the tank entry on the reverse of this form.**

15. If any problems are noted, a copy of this report must go to the Health and Safety Committee. Depending upon the severity of the problem, a fact-finding may be required.

I have read and understand the foregoing procedures and requirements.

Signatures: _____ Individual Entering the Tank _____ Observer/Attendant

_____ Authorized Company Approval

Reviewed by the Supervisor: _____ Date: 6-28-16

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